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Attorneys for Defendant TM Equities, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHRISTINA CANTU and REBEKAH
SVINNING, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

THOMPSON MICHIE ASSOCIATES, LLC, a
foreign limited liability company; TM
EQUITIES INC., f/k/a THOMPSON MICHIE
ASSOCIATES, INC., a foreign corporation;
DOES 1 through 50, inclusive,

Defendants.

Case No. 2:24-cv-00908 -APG-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DEFENDANT TM EQUITIES INC. TO
RESPOND TO CLASS AND
COLLECTIVE ACTION COMPLAINT**

(SECOND REQUEST)

STIPULATION

Plaintiffs CHRISTINA CANTU and REBEKAH SVINNING, on behalf of themselves
and all others similarly situated (“Plaintiffs”) and Defendant TM EQUITIES INC. (“Defendant”),
by and through their undersigned counsel of record, hereby stipulate and agree, pursuant to LR
IA 6-1 and 6-2, as follows. This is the second request for the extension of this deadline.

1. Plaintiffs filed their Class & Collective Action Complaint and Individual
Complaint on April 8, 2024 (“Complaint”). ECF No. 1-2, Ex. A.

2. Defendant was served with the Complaint on April 15, 2024. ECF No. 1-2, Ex. D.

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3. Defendant Thompson Michie Associates, LLC removed this action to this Court on Tuesday, May 14, 2024. ECF No. 1.

4. Defendant's response to the Complaint is currently due to be filed by May 28, 2024, as extended by stipulation and order. ECF Nos. 6 and 7.

5. Defendant and Plaintiffs hereby agree to extend the deadline for Defendant to respond to the Complaint by one week, from May 28, 2024, to and including June 4, 2024. Defendant reserves all defenses and objections, and Defendant and Plaintiffs have agreed to a separate Tolling Agreement for the limited purpose of tolling the statute of limitations for absent class members with respect to FLSA claims in the Complaint, only, for the duration of the extension (resulting in a total Tolling Period of two weeks, or fourteen calendar days, inclusive of both requested extensions of this deadline).

6. This Stipulation is made to accommodate recent illness and scheduling of Defendant's counsel and to allow Defendant to fully prepare its response to the Complaint, and not for the purpose of delay. Therefore, good cause exists to extend the deadline for Defendant's response to the Complaint.

IT IS SO STIPULATED.

Dated this 24th day of May, 2024.

HOLLAND & HART LLP

/s/ Sydney R. Gambee

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RAFI & ASSOCIATES, P.C.

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: 5/28/2024